

# **EXHIBIT DD**



**FinCEN** | Financial Crimes Enforcement Network  
United States Department of the Treasury

**BSAR Transcript**  
**BSA: 31000266505487 and DCN:**

BSA:31000266505487

Filing Information	
Type of Report	Continuing Activity Report
Filing Date	03/11/2024
Received Date	03/11/2024
Entry Date	03/12/2024
Amended	Prior BSA ID: 31000259112891
Submission Method	Electronic batch filing

Subject Information		
Subject 1 of 3 : *PSYCHE HEALING AND BRIDGING, LLC		
Role	Subject	
Individual/Organization	Organization	
Last(or Entity) Name	*PSYCHE HEALING AND BRIDGING, LLC	
EIN	932377864	
Form(s) of Identification	Identification Type	Other
	Identification Number	134873940160
	Other Text	SOS
	Issuing State Code	CT
	Issuing State	Connecticut
	Issuing Country Code	US
Address(es)	Address Type	Subject permanent/mailling address
	Street Address	1969 N STATE STREET
		1969 N STATE ST - Enhanced
	City	PROVO
		PROVO - Enhanced
	State	UT
		UT - Enhanced
	ZIP Code	84604
		84604-1012 - Enhanced
	Country	US
		US - Enhanced
NAICS Code	6213	
NAICS Code Text	Offices of Other Health Practitioners	
Email(s)	BRIDGERJENSEN@GMAIL.COM	
Occupation/Type of Business	Health practice	
Corroborative Statement to Filer	No	
Relationship to Reporting	Institution TIN	340797057



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United States Department of the Treasury

**BSAR Transcript**  
**BSA: 31000266505487 and DCN:**

BSA:31000266505487

Subject Information		
Institution(s)	Relationship of Subject	Customer: Yes
Affected Account(s)	Account Number	44075100 [REDACTED]
	Financial Institution TIN	340797057
<b>Subject 2 of 3 : *SINGULARISM</b>		
Role	Subject	
Individual/Organization	Organization	
Last(or Entity) Name	*SINGULARISM	
EIN	920835772	
Form(s) of Identification	Identification Type	Other
	Identification Number	130076110140
	Other Text	SOS
	Issuing State Code	CT
	Issuing State	Connecticut
	Issuing Country Code	US
Address(es)	Address Type	Subject permanent/mailling address
	Street Address	1899 S 1030 W
		1899 S 1030 W - Enhanced
	City	OREM
		OREM - Enhanced
	State	UT
		UT - Enhanced
	ZIP Code	84058-8141
		84058-8141 - Enhanced
	Country	US
US - Enhanced		
NAICS Code	8133	
NAICS Code Text	Social Advocacy Organizations	
Email(s)	BRIDGERJENSEN@GMAIL.COM	
Occupation/Type of Business	Religious/therapeutic services	
Corroborative Statement to Filer	No	
Relationship to Reporting Institution(s)	Institution TIN	340797057
	Relationship of Subject	Customer: Yes
Affected Account(s)	Account Number	440751006121
	Financial Institution TIN	340797057
<b>Subject 3 of 3 : JENSEN</b>		
Role	Subject	





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**BSAR Transcript**  
**BSA: 31000266505487 and DCN:**

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Subject Information		
Individual/Organization	Individual	
Last(or Entity) Name	JENSEN	
First Name	BRIDGER	
Middle Name	L	
Gender Type	Male	
Date of Birth	09/06/1981	
SSN/ITIN	529896155	
Form(s) of Identification	Identification Type	Driver's license/State ID
	Identification Number	162491187
	Issuing State Code	CT
	Issuing State	Connecticut
	Issuing Country Code	US
Address(es)	Address Type	Subject permanent/mailling address
	Street Address	1899 S 1030 W
		1899 S 1030 W - Enhanced
	City	OREM
		OREM - Enhanced
	State	UT
		UT - Enhanced
	ZIP Code	84058-8141
		84058-8141 - Enhanced
	Country	US
		US - Enhanced
Phone Number(s)	Type	Mobile
	Number	(801) 203-0102
Email(s)	BRIDGERJENSEN@GMAIL.COM	
Occupation/Type of Business	Therapist\Life Coach	
Corroborative Statement to Filer	No	
Relationship to Reporting Institution(s)	Institution TIN	340797057
	Relationship of Subject	Customer: Yes
Affected Account(s)	Account 1 of 2	
	Account Number	440751006113
	Financial Institution TIN	340797057
	Account 2 of 2	
	Account Number	440751006121
	Financial Institution TIN	340797057



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United States Department of the Treasury

**BSAR Transcript**  
BSA: 31000266505487 and DCN:

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Suspicious Activity Information	
Amount Involved	\$68,441
Cumulative Amount	\$279,872
Date or Date Range of Activity	11/15/2023 - 02/05/2024
Money laundering	Suspicious EFT/wire transfers Suspicious concerning the source of funds
Other suspicious activities	Other: Negative news Transaction with no apparent economic, business, or lawful purpose
Financial instrument or payment mechanism	U.S. Currency Other Financial instrument or payment mechanism: EFT/ Wire
Financial product	Deposit account

Activity Location		
Financial Institution Location 1 of 1		
Type of Financial Institution	Depository institution	
Primary Regulator	OCC	
Legal Name	KEYBANK NA	
EIN	340797057	
Role in Transaction	Selling/Paying Location	
Address	Address Type	Address where transaction occurred
	Street Address	127 PUBLIC SQUARE
		127 PUBLIC SQ - Enhanced
	City	CLEVELAND
		CLEVELAND - Enhanced
	State	OH
		OH - Enhanced
	ZIP Code	44114-1226
		44114-1217 - Enhanced
	Country	US
		US - Enhanced
Internal Control File Number	CA3295626	
Branch Office Location 1 of 1		
Financial Institution Name	KEYBANK NA	
RSSD Number	0939173	
Address	Address Type	Address where transaction occurred
	Street Address	207 NORTH UNIVERSITY AVE
		207 N UNIVERSITY AVE - Enhanced
	City	PROVO
		PROVO - Enhanced





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**BSAR Transcript**  
BSA: 31000266505487 and DCN:

BSA:31000266505487

Activity Location		
	State	UT
		UT - Enhanced
	ZIP Code	84603
		84601-2836 - Enhanced
	Country	US
		US - Enhanced

Filer Information		
Primary Regulator	OCC	
Filer Name	KEYBANK NA	
EIN	340797057	
Address	Address Type	Reporting party address
	Street Address	127 PUBLIC SQUARE
		127 PUBLIC SQ - Enhanced
	City	CLEVELAND
		CLEVELAND - Enhanced
	State	OH
		OH - Enhanced
	ZIP Code	44114-1226
		44114-1217 - Enhanced
	Country	US
	US - Enhanced	
Type of Financial Institution	Depository institution	
RSSD Number	280110	
Internal control/file number	CA3295626	
Contact for Assistance	Full Name	AML UNIT
	Phone Number	(216) 813-4709
	Phone Type	Work

Law Enforcement Information
No Law Enforcement Information Available

Narrative
KeyBank Case Number: CA3295626
Case Name: BRIDGER L JENSEN
NTP-Drugs



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United States Department of the Treasury

**BSAR Transcript**  
**BSA: 31000266505487 and DCN:**

BSA:31000266505487

**Narrative**

**INTRODUCTION:**

This supplemental review is the result of KeyBank's SAR monitoring process, involving KeyBank accounts 440751006113 and 440751006121 in the names of PSYCHE HEALING AND BRIDGING, LLC, SINGULARISM and BRIDGER L JENSEN. There was one prior investigation for this customer that resulted in one SAR filing (11/27/2023). The most recent investigation covered the timeframe of 07/14/2023 (opening) through 11/14/2023, which resulted in the SAR filing on 11/27/2023 for inbound wires from various individuals/ entity from unknown sources and merchant credits. Additional suspicious activity involved cash withdrawals as they had no clear economic purpose for the business type and CTR evasion. Furthermore, our customer was identified operating a magic mushroom therapy practice. Therefore, deposits associated as business proceeds could have been proceeds from the illicit sale of drugs. Since the last review, there were no alerts generated.

This investigation, which covers the time period of 11/15/2023 through 02/16/2024 (closure), disclosed continuing suspicious activity involving merchant service credits as they could be proceeds from the illicit sale of psilocybin, a schedule I controlled substance under Utah law. Additional suspicious activity involves cash withdrawals as there does not appear to be a clear business purposes for the activity given the nature of the business involves illegal controlled substances. The suspicious activity totals \$68,441 in accounts 440751006113 and 440751006121 which occurred between 11/15/2023 through 02/05/2024 at KeyBank branch UT075. The cumulative amount of all suspicious activity being reported with this and the prior SAR which occurred between 08/02/2023 through 02/05/2024 is \$279,871.66. SAR warranted.

**DETAILS OF INVESTIGATION:**

According to bank records BRIDGER L JENSEN, 42 is the Controlling Party of PSYCHE BRIDGING AND HEALING and SINGULARISM. The customer is listed as the 50% Beneficial Owner of PSYCHE BRIDGING AND HEALING. External research revealed he is a life coach/therapist associated with UTAH PSYCHEDELIC THERAPY, MENTAL GURUS, REVEAL MYSELF, PSYCHEDELICCON and UTAH MUSHROOM THERAPY. These entities appear to provide therapy services specializing in clinical psychedelic integration. The customer holds a BS in Therapeutic Recreation/ Psychology from BRIGHAM YOUNG UNIVERSITY and Master of Psychological Counseling from UNIVERSITY OF PHOENIX. The customer has been a KeyBank customer since





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**Narrative**

07/14/2023 and is listed as residing in Orem, UT. According to bank records and external research PSYCHE BRIDGING AND HEALING appears to be a therapeutic practice in Provo, UT and has been a KeyBank customer since 07/14/2023. According to bank records and external research SINGULARISM appears to a nonprofit group which held its ribbon cutting ceremony on Sept. 6th, 2023. The business appears to be a clinically informed spiritual wellness center plans to begin sessions Oct 1st, 2023. They have been a KeyBank customer since 08/01/2023. They are a grassroots team empowering the legal use of psychedelics for clinical and clergy leadership. The company advertises use of magic mushrooms (psilocybin) for therapeutic services. According to news articles in November 2023, psilocybin is a Schedule I controlled substance and under Utah law, it is illegal to possess or distribute. A recent effort to legalize psilocybin was not approved by the legislature, therefore use and distribution continue to be criminal offenses. JENSEN says they're protected by the Religious Freedom Restoration Act of the U.S. Constitution. The clinic claims they has taken every effort to accord with state and federal constitutional and statutory religious freedom authorities which would permit its religious practices. SINGULARISM is prepared to defend its religious freedom to, as a small religious minority group, partake of its religious rites and sacraments in a closed, supervised, and secure setting. Based upon research conducted by the Utah County Attorney's office, it does not appear that SINGULARISM has constitutional protections to either use or administer psilocybin. City of Provo Police Department released a statement regarding the business and how the mushroom treatment center is allowed to operate legally, and a spokesperson issued the following statement: Psilocybin is a Schedule I controlled substance and under Utah law, it is illegal to possess or distribute. A recent effort to legalize psilocybin was not approved by the legislature, therefore use and distribution continue to be criminal offenses. We have evaluated recent claims that use is protected under the Religious Freedom Restoration Act, and we believe those claims to be without merit. The position of the Provo Police Department is that officers will treat psilocybin as an illegal drug and will arrest or cite users and distributors and refer charges to the Utah County Attorney's Office. We have confirmed with that office that they intend to prosecute violators. A review of public records through Lexis Nexis, World-Check did not reveal any apparent adverse information.

As this case was initiated as part of KeyBank's SAR Monitoring process, this investigation only covers accounts in which suspicious activity was uncovered during the previous investigation. Other related accounts in which no suspicious activity was uncovered will not be reviewed unless required due to suspicious flow of funds or alerted activity.





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**Narrative**

The clients maintain a total of two business checking accounts.

The focus of the investigation consists of the following accounts:

Business Checking account 440751006113 was opened on 07/14/2023 and closed on 02/16/2024. The account is titled PSYCHE HEALING AND BRIDGING, LLC, and BRIDGER L JENSEN. This account was reviewed from 11/15/2023 through 02/16/2024 (closure). Credits consists of eight direct deposits from INTUIT totaling \$17,026, appearing as merchant service credits. As the nature of the business involves illegal controlled substances, these deposits are considered suspicious as they could be from the illicit sale of psilocybin, a schedule I controlled substance under Utah law. Additional credits are primarily made up of transfers from internal related account 440751006121. Cash withdrawals are made up of three transactions on 11/16/2023, ranging from \$950 to \$3,568, totaling \$7,418. While a decrease is noted, there does not appear to be a clear business purposes for the activity given the nature of the business involves illegal controlled substances. As such, cash withdrawals are deemed suspicious. Further suspicious debits include four direct withdrawals totaling \$26,054 to PSYCHE HEALING. The purpose of these debits is unknown and could be related to supply purchases. Debit activity not considered unusual includes payments with entities such as ADOBE, AMAZON, DOORDASH, ASPIRE HEALTH, EMPYREAN ADVISOR, FABIAN VANCOTT (lawyer), INTUIT, GOOGLE, VONAGE BUSINESS, and XFINITY. There are two Official Bank Check (OBC) purchases on 02/08/2024 totaling \$11,630, payable to BRIDGER L JENSEN, which are likely related to the account being closed. Suspicious activity identified.

Business Checking account 440751006121 was opened on 08/01/2023 and closed on 02/16/2024. The account is titled SINGULARISM and BRIDGER L JENSEN. This account was reviewed from 11/15/2023 through 02/16/2024 (closure). Credits consists of four direct deposits from INTUIT totaling \$17,943 appearing as merchant service credits. As the nature of the business involves illegal controlled substances, these deposits are considered suspicious as they could be from the illicit sale of psilocybin, a schedule I controlled substance under Utah law. No cash withdrawals occurred. Debits are made up of payments with entities such as AMAZON, APPLE, DOORDASH, GUSTO, INTUIT, COSTCO, WAL-MART, POSITIVEPSYCHOLOGY.COM and a \$6,125 OBC on 02/08/2024, payable to BRIDGER L JENSEN, which is likely related to the account being closed. Suspicious activity identified.



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**Narrative**

A sampling of the suspicious activity is detailed below:

Account #440751006121

Date	Amount	Description
11/15/2023	\$3,960.00	DIRECT DEPOSIT, INTUIT 77470515 DEPOSIT
12/6/2023	\$2,985.00	DIRECT DEPOSIT, INTUIT 70965005 DEPOSIT
1/2/2024	\$4,999.00	DIRECT DEPOSIT, INTUIT 65742965 DEPOSIT

Account #440751006113

Date	Amount	Description
11/16/2023	\$3,568.00	CASH WD- UT075
11/16/2023	\$2,900.00	CASH WD- UT075
11/16/2023	\$950.00	CASH WD- UT075
11/27/2023	\$7,618.00	DIRECT WITHDRAWAL, PSYCHE HEALING AKBBO ACH
1/2/2024	\$1,855.00	DIRECT DEPOSIT, INTUIT 65661185 DEPOSIT
1/10/2024	\$5,400.00	DIRECT DEPOSIT, INTUIT 08067655 DEPOSIT
1/18/2024	\$2,700.00	DIRECT DEPOSIT, INTUIT 39170425 DEPOSIT
2/5/2024	\$49.00	DIRECT DEPOSIT, INTUIT 19002505 DEPOSIT

The suspicious activity totals \$68,441 in accounts 440751006113 and 440751006121 which occurred between 11/15/2023 through 02/05/2024 at KeyBank branch UT075.

**CONCLUSION:**

This supplemental review is the result of KeyBank's SAR monitoring process, involving KeyBank accounts 440751006113 and





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**Narrative**

440751006121 in the names of PSYCHE HEALING AND BRIDGING, LLC, SINGULARISM and BRIDGER L JENSEN. There was one prior investigation for this customer that resulted in one SAR filing (11/27/2023). The most recent investigation covered the timeframe of 07/14/2023 (opening) through 11/14/2023, which resulted in the SAR filing on 11/27/2023 for inbound wires from various individuals/ entity from unknown sources and merchant credits. Additional suspicious activity involved cash withdrawals as they had no clear economic purpose for the business type and CTR evasion. Furthermore, our customer was identified operating a magic mushroom therapy practice. Therefore, deposits associated as business proceeds could have been proceeds from the illicit sale of drugs. Since the last review, there were no alerts generated.

This investigation, which covers the time period of 11/15/2023 through 02/16/2024 (closure), disclosed continuing suspicious activity involving merchant service credits as they could be proceeds from the illicit sale of psilocybin, a schedule I controlled substance under Utah law. Additional suspicious activity involves cash withdrawals as there does not appear to be a clear business purposes for the activity given the nature of the business involves illegal controlled substances. The suspicious activity totals \$68,441 in accounts 440751006113 and 440751006121 which occurred between 11/15/2023 through 02/05/2024 at KeyBank branch UT075. The cumulative amount of all suspicious activity being reported with this and the prior SAR which occurred between 08/02/2023 through 02/05/2024 is \$279,871.66. SAR warranted.

**Contents of File:**

Customer and Account Profiles

Checks, deposited items and account statements

Cash and Wire Reports

Internet Research

Analytical Spreadsheet

Law Enforcement requests for documentation can be sent to [lerequest@keybank.com](mailto:lerequest@keybank.com)





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**BSAR Transcript**  
**BSA: 31000259112891 and DCN:**

BSA:31000259112891

Filing Information	
Type of Report	Initial Report
Filing Date	11/27/2023
Received Date	11/27/2023
Entry Date	11/28/2023
Submission Method	Electronic batch filing

Subject Information		
Subject 1 of 3 : *PSYCHE HEALING AND BRIDGING, LLC		
Role	Subject	
Individual/Organization	Organization	
Last(or Entity) Name	*PSYCHE HEALING AND BRIDGING, LLC	
EIN	932377864	
Form(s) of Identification	Identification Type	Other
	Identification Number	134873940160
	Other Text	SOS
	Issuing State Code	UT
	Issuing State	Utah
	Issuing Country Code	US
Address(es)	Address Type	Subject permanent/mailling address
	Street Address	1969 N STATE STREET
		1969 N STATE ST - Enhanced
	City	PROVO
		PROVO - Enhanced
	State	UT
		UT - Enhanced
	ZIP Code	84604
		84604-1012 - Enhanced
	Country	US
		US - Enhanced
NAICS Code	6213	
NAICS Code Text	Offices of Other Health Practitioners	
Email(s)	BRIDGERJENSEN@GMAIL.COM	
Occupation/Type of Business	Health practice	
Corroborative Statement to Filer	No	
Relationship to Reporting Institution(s)	Institution TIN	340797057
	Relationship of Subject	Customer: Yes



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**BSAR Transcript**  
**BSA: 31000259112891 and DCN:**

BSA:31000259112891

Subject Information		
Affected Account(s)	Account Number	44075100 [REDACTED]
	Financial Institution TIN	340797057
Subject 2 of 3 : *SINGULARISM		
Role	Subject	
Individual/Organization	Organization	
Last(or Entity) Name	*SINGULARISM	
EIN	920835772	
Form(s) of Identification	Identification Type	Other
	Identification Number	130076110140
	Other Text	SOS
	Issuing State Code	UT
	Issuing State	Utah
	Issuing Country Code	US
Address(es)	Address Type	Subject permanent/mailling address
	Street Address	1899 S 1030 W
		1899 S 1030 W - Enhanced
	City	OREM
		OREM - Enhanced
	State	UT
		UT - Enhanced
	ZIP Code	84058-8141
		84058-8141 - Enhanced
	Country	US
US - Enhanced		
NAICS Code	8133	
NAICS Code Text	Social Advocacy Organizations	
Email(s)	BRIDGERJENSEN@GMAIL.COM	
Occupation/Type of Business	Religious/therapeutic services	
Corroborative Statement to Filer	No	
Relationship to Reporting Institution(s)	Institution TIN	340797057
	Relationship of Subject	Customer: Yes
Affected Account(s)	Account Number	440751006121
	Financial Institution TIN	340797057
Subject 3 of 3 : JENSEN		
Role	Subject	
Individual/Organization	Individual	



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**BSAR Transcript**  
**BSA: 31000259112891 and DCN:**

BSA:31000259112891

Subject Information		
<b>Last(or Entity) Name</b>	JENSEN	
<b>First Name</b>	BRIDGER	
<b>Middle Name</b>	L	
<b>Gender Type</b>	Male	
<b>Date of Birth</b>	09/06/1981	
<b>SSN/ITIN</b>	529896155	
<b>Form(s) of Identification</b>	<b>Identification Type</b>	Driver's license/State ID
	<b>Identification Number</b>	162491187
	<b>Issuing State Code</b>	UT
	<b>Issuing State</b>	Utah
	<b>Issuing Country Code</b>	US
<b>Address(es)</b>	<b>Address Type</b>	Subject permanent/mailling address
	<b>Street Address</b>	1899 S 1030 W
		1899 S 1030 W - Enhanced
	<b>City</b>	OREM
		OREM - Enhanced
	<b>State</b>	UT
		UT - Enhanced
	<b>ZIP Code</b>	84058-8141
		84058-8141 - Enhanced
	<b>Country</b>	US
		US - Enhanced
<b>Phone Number(s)</b>	<b>Type</b>	Mobile
	<b>Number</b>	(801) 203-0102
<b>Email(s)</b>	BRIDGERJENSEN@GMAIL.COM	
<b>Occupation/Type of Business</b>	Therapist\Life Coach	
<b>Corroborative Statement to Filer</b>	No	
<b>Relationship to Reporting Institution(s)</b>	<b>Institution TIN</b>	340797057
	<b>Relationship of Subject</b>	Customer: Yes
<b>Affected Account(s)</b>	<b>Account 1 of 2</b>	
	<b>Account Number</b>	440751006113
	<b>Financial Institution TIN</b>	340797057
	<b>Account 2 of 2</b>	
	<b>Account Number</b>	440751006121
	<b>Financial Institution TIN</b>	340797057





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**BSAR Transcript**  
**BSA: 31000259112891 and DCN:**

BSA:31000259112891

Suspicious Activity Information	
Amount Involved	\$211,431
Date or Date Range of Activity	08/02/2023 - 11/02/2023
Money laundering	Suspicious EFT/wire transfers Suspicious concerning the source of funds Transaction out of pattern for customer(s)
Structuring	Alters or cancels transaction to avoid CTR requirement Transaction(s) below CTR threshold
Other suspicious activities	Transaction with no apparent economic, business, or lawful purpose
Financial instrument or payment mechanism	Other Financial instrument or payment mechanism: EFT/ Wire U.S. Currency
Financial product	Deposit account

Activity Location		
Financial Institution Location 1 of 1		
Type of Financial Institution	Depository institution	
Primary Regulator	OCC	
Legal Name	KEYBANK NA	
EIN	340797057	
Role in Transaction	Selling/Paying Location	
Address	Address Type	Address where transaction occurred
	Street Address	127 PUBLIC SQUARE 127 PUBLIC SQ - Enhanced
	City	CLEVELAND CLEVELAND - Enhanced
	State	OH OH - Enhanced
	ZIP Code	44114-1226 44114-1217 - Enhanced
	Country	US US - Enhanced
	Internal Control File Number CA3255423	
	Branch Office Location 1 of 1	
Financial Institution Name	KEYBANK NA	
RSSD Number	0939173	
Address	Address Type	Address where transaction occurred
	Street Address	207 NORTH UNIVERSITY AVE 207 N UNIVERSITY AVE - Enhanced
	City	PROVO



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**BSAR Transcript**  
BSA: 31000259112891 and DCN:

BSA:31000259112891

Activity Location		
		PROVO - Enhanced
	State	UT
		UT - Enhanced
	ZIP Code	84603
		84601-2836 - Enhanced
	Country	US
		US - Enhanced

Filer Information		
Primary Regulator	OCC	
Filer Name	KEYBANK NA	
EIN	340797057	
Address	Address Type	Reporting party address
	Street Address	127 PUBLIC SQUARE
		127 PUBLIC SQ - Enhanced
	City	CLEVELAND
		CLEVELAND - Enhanced
	State	OH
		OH - Enhanced
	ZIP Code	44114-1226
44114-1217 - Enhanced		
Country	US	
	US - Enhanced	
Type of Financial Institution	Depository institution	
RSSD Number	280110	
Internal control/file number	CA3255423	
Contact for Assistance	Full Name	AML UNIT
	Phone Number	(216) 813-4709
	Phone Type	Work

Law Enforcement Information
No Law Enforcement Information Available

Narrative
KeyBank Case Number: CA3255423
Case Name: BRIDGER L JENSEN





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United States Department of the Treasury

**BSAR Transcript**  
**BSA: 31000259112891 and DCN:**

BSA:31000259112891

**Narrative**

NTP-Drugs

**INTRODUCTION:**

This case was initiated upon receipt of an internal referral from KeyBank branch personnel regarding conducting cash withdrawals in a manner indicative of purposefully evading reporting requirements. The activity involves KeyBank Account 440751006113 in the name of BRIDGER L JENSEN and PSYCHE HEALING AND BRIDGING, LLC. There were no prior investigations identified.

This investigation, which covers the time period of 07/14/2023 (opening) through 11/14/2023, disclosed suspicious account activity involving inbound wires from various individuals/ entity from unknown sources and merchant credits. Additional suspicious account activity involves cash withdrawals as they have no clear economic purpose for the business type. Additionally, some approach just under the reporting threshold. Branch personnel revealed the client intentionally limits cash withdrawals to evade reporting. Furthermore, our customer was identified operating a magic mushroom therapy practice. Therefore, deposits associated as business proceeds could be proceeds from the illicit sale of psilocybin, a schedule I controlled substance and under Utah law. The suspicious activity totals \$211,430.66 in accounts 440751006113 and 440751006121 which occurred between 08/02/2023 through 11/02/2023 at KeyBank branch UT075. SAR warranted.

**DETAILS OF INVESTIGATION:**

According to bank records BRIDGER L JENSEN, 42 is the Controlling Party of PSYCHE BRIDGING AND HEALING and SINGULARISM. The customer is listed as the 50% Beneficial Owner of PSYCHE BRIDGING AND HEALING. External research revealed he is a life coach/therapist associated with UTAH PSYCHEDELIC THERAPY, MENTAL GURUS, REVEAL MYSELF, PSYCHEDELICCON and UTAH MUSHROOM THERAPY. These entities appear to provide therapy services specializing in clinical psychedelic integration. The customer holds a BS in Therapeutic Recreation/ Psychology from BRIGHAM YOUNG UNIVERSITY and Master of Psychological Counseling from UNIVERSITY OF PHOENIX. The customer has been a KeyBank customer since 07/14/2023 and is listed as residing in Orem, UT. According to bank records and external research PSYCHE BRIDGING AND HEALING appears to be a therapeutic practice in Provo, UT and has been a KeyBank customer since 07/14/2023. According to





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bank records and external research SINGULARISM appears to a nonprofit group which held its ribbon cutting ceremony on Sept. 6th, 2023. The business appears to be a clinically informed spiritual wellness center plans to begin sessions Oct 1st, 2023. They have been a KeyBank customer since 08/01/2023. They are a grassroots team empowering the legal use of psychedelics for clinical and clergy leadership. The company advertises use of magic mushrooms (psilocybin) for therapeutic services. According to news articles in November 2023, psilocybin is a Schedule I controlled substance and under Utah law, it is illegal to possess or distribute. A recent effort to legalize psilocybin was not approved by the legislature, therefore use and distribution continue to be criminal offenses. JENSEN says they're protected by the Religious Freedom Restoration Act of the U.S. Constitution. The clinic claims they has taken every effort to accord with state and federal constitutional and statutory religious freedom authorities which would permit its religious practices. SINGULARISM is prepared to defend its religious freedom to, as a small religious minority group, partake of its religious rites and sacraments in a closed, supervised, and secure setting. Based upon research conducted by the Utah County Attorney's office, it does not appear that SINGULARISM has constitutional protections to either use or administer psilocybin. City of Provo Police Department released a statement regarding the business and how the mushroom treatment center is allowed to operate legally, and a spokesperson issued the following statement: Psilocybin is a Schedule I controlled substance and under Utah law, it is illegal to possess or distribute. A recent effort to legalize psilocybin was not approved by the legislature, therefore use and distribution continue to be criminal offenses. We have evaluated recent claims that use is protected under the Religious Freedom Restoration Act, and we believe those claims to be without merit. The position of the Provo Police Department is that officers will treat psilocybin as an illegal drug and will arrest or cite users and distributors and refer charges to the Utah County Attorney's Office. We have confirmed with that office that they intend to prosecute violators. A review of public records through Lexis Nexis, World-Check did not reveal any apparent adverse information.

The focus of the investigation consists of the following account(s):

Business Checking account 440751006113 was opened on 07/14/2023. The account is titled BRIDGER L JENSEN and PSYCHE HEALING AND BRIDGING, LLC. This account was reviewed from 07/14/2023 (opening) through 11/14/2023. Credit activity during this review is made up of various retail return credits from entities such as AMAZON, IKEA, LOWS, and HOME GOODS. A \$4,900 cash deposit is also noted on 08/01/2023. Funding is primarily made up of four wire deposits totaling \$125,000 from ASPIRE



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HEALTH MANAGEMENT LLC, a healthcare support business. Further wires are noted from SKYLER JED ROBERTSON and JERAMY & BECKY LUND. External research suggest SKYLER JED ROBERTSON is a mental health supporter and JERAMY LUND appears to be a business start-up investor. One wire from ASPIRE HEALTH MANAGEMENT LLC has the memo (ASPIRE BUY IN). The wires appear to be business start up investments from related health/ investment counterparties. Although it appears the purpose is for the startup of the business, there is suspicion concerning the source of funds. Additionally, the nature of the business involves illegal controlled substances. As such, all wire deposits are suspicious. Debits are made up of payments with entities such as ADOBE, AMAZON, AMERICA FIRST CREDIT UNION, ASPIRE HEALTH, EMPYREAN ADVISORS (healthcare consultants), FABIAN VANCOTT (law firm), INTUIT, GOOGLE, IKEA, METAPAY, ONTRAPORT (marketing/ sales), WAL-MART, COSTCO, ROSS STORES, RC WILLEY (furniture), U-HAUL, XFINITY, RIVERS STUDIO (design and staging) and ZOOM. One wire is noted on 08/23/2023 to KAILEY STOCCO with memo interior design. Cash withdrawals are made up 14 transactions between 08/08/2023 through 10/31/2023 ranging from \$200 to \$5,900 totaling \$37,260. Branch contact with personnel at UT075 revealed the client is aware of the cash reporting requirements and intentionally limits cash withdrawals to evade reporting. Staff believed the business operated as a psychic service and a church. The branch found the customer unusual as he clearly articulated that he does not want the government to find out about his cash withdrawals and learned to keep cash under \$10,000 from his father. The employee stated the customer is always in a hurry and only wants to conduct transactions with her. She stated she gets anxiety when he is in the branch because he is always rushing her. She finds overall cash withdrawals odd for the business type and does not know the purpose of the cash debits. The customer was in the branch yesterday wanting to open a new business account however, decided against it since he knew he would exceed \$10,000 in one day. Review of cash debits revealed two cash withdrawals on 08/08/2023: \$4,000 and \$5,900 totaling \$9,900. The debits total just below the threshold. Overall cash withdrawals are conducted for unknown purposes as they do not appear consistent with therapy services. Coupled with the client's knowledge and apparent attempt to evade reporting, all are deemed suspicious. Suspicious activity identified.

Business Checking account 440751006121 was opened on 08/01/2023. The account is titled SINGULARISM and BRIDGER L JENSEN. This account was reviewed from 08/01/2023(opening) through 11/14/2023. Credits are made up of a \$100 cash deposit on 08/01/2023 and direct deposits from INTUIT and STRIPE totaling \$46,880.66. These deposits could be proceeds from the illicit sale of psilocybin, a schedule I controlled substance and under Utah law. As such, all direct deposits are deemed suspicious.





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Debits are made up of two cash withdrawals between 09/12/2023 and 10/03/2023 ranging from \$100 to \$2,190 totaling \$2,290. Additional debits include payments with entities such as AMAZON, GUSTO, INTUIT, WAL-MART, UTAH INTERACTIVE LLC (website design), and SUMMIT HEALTH, UTAH CORPORATIONS, transfers to 440751006113 and a \$5,000 Official Bank Check (OBC) purchase on 10/17/2023 made payable to CASSIE MEDURA, who appears to be a family lawyer. Suspicious activity includes cash withdrawals as the true purpose of those debits are unknown and not consistent with business type. Suspicious activity identified.

A sampling of the suspicious activity is detailed below:

Account #440751006113

Date	Amount	Description
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8/2/2023	\$25,000.00	WIRE DEP-SKYLER JED ROBERTSON
8/8/2023	\$4,000.00	WITHDRAWAL BRANCH 0075 UTAH
8/8/2023	\$5,900.00	WITHDRAWAL BRANCH 0075 UTAH
9/12/2023	\$5,900.00	WITHDRAWAL BRANCH 0075 UTAH
10/17/2023	\$3,560.00	WITHDRAWAL BRANCH 0075 UTAH
10/19/2023	\$50,000.00	WIRE DEP-JERAMY & BECKY LUND

Account #440751006121

Date	Amount	Description
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9/20/2023	\$5.00	DIRECT DEPOSIT, INTUIT 06093985 DEPOSIT
9/20/2023	\$7,179.46	DIRECT DEPOSIT, STRIPE TRANSFER
9/27/2023	\$7,600.00	DIRECT DEPOSIT, INTUIT 10826475 DEPOSIT
9/29/2023	\$6,214.10	DIRECT DEPOSIT, STRIPE TRANSFER
10/5/2023	\$6,214.10	DIRECT DEPOSIT, STRIPE TRANSFER





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10/13/2023 \$4,800.00 DIRECT DEPOSIT, INTUIT 28567785 DEPOSIT  
10/17/2023 \$4,800.00 DIRECT DEPOSIT, INTUIT 48157215 DEPOSIT  
10/18/2023 \$6,400.00 DIRECT DEPOSIT, INTUIT 49653875 DEPOSIT  
11/2/2023 \$3,668.00 DIRECT DEPOSIT, INTUIT 22649635 DEPOSIT

The suspicious activity totals \$211,430.66 in accounts 440751006113 and 440751006121 which occurred between 08/02/2023 through 11/02/2023 at KeyBank branch UT075.

**CONCLUSION:**

This case was initiated upon receipt of an internal referral from KeyBank branch personnel regarding conducting cash withdrawals in a manner indicative of purposefully evading reporting requirements. The activity involves KeyBank Account 440751006113 in the name of BRIDGER L JENSEN and PSYCHE HEALING AND BRIDGING, LLC. There were no prior investigations identified.

This investigation, which covers the time period of 07/14/2023 (opening) through 11/14/2023, disclosed suspicious account activity involving inbound wires from various individuals/ entity from unknown sources and merchant credits. Additional suspicious account activity involves cash withdrawals as they have no clear economic purpose for the business type. Additionally, some approach just under the reporting threshold. Branch personnel revealed the client intentionally limits cash withdrawals to evade reporting. Furthermore, our customer was identified operating a magic mushroom therapy practice. Therefore, deposits associated as business proceeds could be proceeds from the illicit sale of psilocybin, a schedule I controlled substance and under Utah law. The suspicious activity totals \$211,430.66 in accounts 440751006113 and 440751006121 which occurred between 08/02/2023 through 11/02/2023 at KeyBank branch UT075. SAR warranted.

**Contents of File:**

Customer and Account Profiles

Checks, deposited items and account statements



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